UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF INDIANA SOUTH BEND DIVISION

IN THE MATTER OF:)	
DOUBLE TREE LAKE ESTATES, LLC)	CASE NO: 14-31467
)	Chapter 11
Debtor.) .	

MOTION FOR ORDER DIRECTING JOINT ADMINISTRATION OF CASES PURSUANT TO RULE 1015(B) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE

Now comes Double Tree Lake Estates, LLC, by counsel, Daniel L. Freeland & Associates, P.C., and hereby submits this Motion for Order Directing Joint Administration of Cases Pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure ("Motion"). In support thereof, the Debtor respectfully represent and prays as follows:

I. BACKGROUND

- 1. On May 30, 2014, a Voluntary Petition was filed by the Debtor under the above captioned cause.
- 2. There is also pending in this Court the case of DBL Residential, LP, Case Number 14-31469, filed on May 30, 2014, and also DBL Golf, LLC, Case Number 14-31468, filed on May 30, 2014, and in which cases movant is simultaneously filing equivalent Motions for Joint Administration of Cases. Collectively, Double Tree Lake Estates, LLC, DBL Residential, LP, and DBL Golf, LLC, are hereinafter referred to as "Debtors".
- 3. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §1334. This is a core proceeding pursuant to 28 U.S.C. §157(b)(2)(A) and (O). Venue is proper in this district pursuant to 28 U.S.C. §1408 and 1409.

- 4. No creditor's committee or trustee has yet been appointed in either these cases.
- 5. That statutory predicate for the relief requested herein is Section 102 of the Bankruptcy Code and Bankruptcy Rule 1015(b).

II. RELIEF REQUESTED

- 6. These cases are related in that Debtors own and administer certain properties jointly, that Double Tree Lake Estates, LLC, has ownership interests in the other Debtor entities, and many of the secured creditors' obligations are secured by assets of all Debtors. All Debtors have maintained the same office and the Debtors' operations have been served and managed in the same fashion and by the same individuals. Many of the creditors who are parties in one case are also creditors in the other cases.
- 7. Each of the cases are substantially related in that Double Tree Lake Estates, LLC, controls all or has substantial ownership interests in each of the other Debtor entities.
- 8. Joint administration of these cases is necessary to avoid the time and expense associated with filing duplicate motions and preparing duplicate orders, as Debtor would otherwise be required under separate administration. Additionally, consolidation will eliminate the burden of duplicate notices to the substantial number of creditors holding claims in each case. The Court will also be relieved of the burden of entering duplicate orders and keeping duplicate files. Finally, supervision of the administrative aspects of these Chapter 11 cases by the Office of the United States Trustee will be simplified.
- 9. Joint administration of these cases will not adversely affect the rights of the Debtors' respective creditors.
- 10. The Debtors request that such relief apply generally to each of the Debtors' presently filed Chapter 11 cases and pleadings, and that such pleadings be permitted to bear the following

consolidated caption:

IN RE:)	
DOUBLETREE LAKE ESTATES, LLC,)	Case No. 14-31467
DBL RESIDENTIAL, LP, and DBL GOLF, LLC)	
Debtors)	Chapter 11 Proceedings
)	Jointly Administered

11. By reason of the foregoing, joint administration of these Chapter 11 cases is in the best interest of the Debtors, their respective creditors and their estates.

WHEREFORE, the Debtor, Double Tree Lake Estates, LLC, respectfully requests that this Court enter an Order for Joint Administration of Estates, after notice and opportunity for a hearing has been given to all creditors and interested parties in each of the cases, and that it have such other and further relief as is just and proper.

Respectfully submitted:

DANIEL L. FREELAND & ASSOCIATES, P.C.

/s/ Frederick L. Carpenter

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CERTIFICATE OF SERVICE

I certify that I served a true and complete copy of the above and foregoing instrument on this 2nd day of June, 2014, upon the following:

Via Electronic Mail: United States Trustee

Via First Class Mail:

All creditors and parties in interest on the attached Matrix

/s/ Frederick L. Carpenter

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Label Matrix for local noticing 0755-3 Case 14-31467-hcd Northern District of Indiana South Bend Division Mon Jun 2 16:28:09 EDT 2014 DBL Golf, LLC PO Box 191 Culver, IN 46511-0191

DBL Residential LP c/o Atty Daniel L. Freeland 9105 Indianapolis Blvd Highland, IN 46322-2553

Fifth Third Bank P.O. Box 630337 Cincinnati, OH 45263-0337

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KA Enterprises, LLC 10797 Randolph Street Crown Point, IN 46307-7615

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End of Label Matrix
Mailable recipients 20
Bypassed recipients 0
Total 20

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